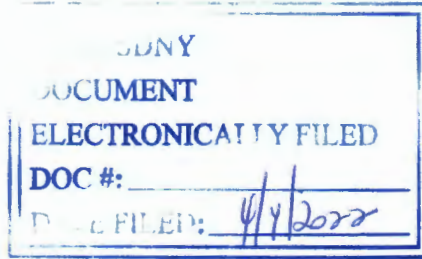


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April 1, 2022

VIA ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: Jane Doe v. Polise Consulting Engineers, D.P.C. et al.
United States District Court, Southern District of New York
Civil Action No. 21-cv-00609 (CM) (SDA)

MEMO ENDORSED

OK
Colleen McMahon
4/4/2022

Dear Chief Judge McMahon:

We represent defendant Polise Consulting Engineers, D.P.C. ("PCE") in the above-captioned action and are writing, in accordance with Section I(D) of Your Honor's Individual Practices, to respectfully request that the Court (i) extend the parties' deadline to submit their joint pre-trial order and other trial filings from April 15 to May 6, 2022, and (ii) "so-order" the following proposed briefing schedule for PCE's anticipated motion for summary judgment:

- 1) PCE to file its moving papers by May 5, 2022;
- 2) Plaintiff to file her opposition papers by June 9, 2022; and
- 3) PCE to file its reply papers by June 30, 2022.

The reason for this request is to accommodate the professional schedule of the undersigned in the coming weeks which includes, among various depositions and applications, the filing of a respondent's brief with the Appellate Division, First Department on April 20th and the filing of moving papers on a motion for summary judgment before Judge Cronan of this Court on May 6th.

Plaintiff and co-defendant consent to this request. This is PCE's first request to extend the pre-trial submissions deadline. There were two prior requests made by plaintiff and one prior request made by co-defendant to extend the fact discovery and pre-trial submissions deadlines, all of which were granted by the Court on consent.

Respectfully submitted,

/s/ *Jared E. Blumetti*

Jared E. Blumetti

cc: Counsel of record (*via ECF*)